

USEPA/OECA/OC  
State and Tribal Assistance Grant (STAG) 1999-2000  
New Hampshire: Measuring the Effectiveness of Partial RCRA Inspection, Risk-based Facility Targeting and  
Compliance Activities  
Quarter 3, FY2003 report  
Uploaded to Internet 3/17/2003

---

**Quarterly Reporting Form for EPA's  
Enforcement and Compliance Assurance Grants**

Reporting Period: Year: FFY'03

**X Oct-Dec (due last working day Jan)**

☐ Jan-Mar (due last working day Apr)

☐ Apr-Jun (due last working day Jul)

☐ Jul-Sep (due last working day Oct)

**I. Information**

State and Department: New Hampshire Department of Environmental Services ("NHDES")

Title of Project: NHDES Compliance Measures Project -- Measuring the Effectiveness of  
NH's "Partial" Inspection, Risk-Based Facility Targeting, and Compliance Assistance/  
Pollution Prevention Strategies

Grant Contact Person: Vincent Perelli, Senior Planner, NHDES, 6 Hazen Dr., Concord,  
NH 03301-6509; ph: 603-271-8989; fax: 603-271-2867; e-mail: vperelli@des.state.nh.us

Funds Received by State (Date and amount): 3/23/00 - \$85,000 pass-through to NEWMOA;  
9/21/01 - \$70,000 awarded, 10/8/01 - \$15,000 final award, amounts formally accepted/  
budgeted in February 2002

EPA Regional Project Officer: Ken Blumberg, Region I

Author of report: Gretchen Rule, Administrator, NHDES Legal Unit (Phase II Project Lead)

**II. Status of Project Milestones**

Each milestone for the entire project should be entered into this table at the beginning of the grant period and should appear in every quarterly report (unless it is dropped from the project). With each quarterly report fill in dates or add milestones as appropriate. If dates or milestones are adjusted in subsequent reports, please indicate this in the comment field or in text below the table.

Project Milestones	Anticipated Completion Date	Completion Date	Comments
<b><i>Phase I – Refining Project Purpose and Scope</i></b>			
Determine appropriate contractor	*	06/01/00	* 1 <sup>st</sup> rpt submitted using this format
Initial meeting w/ contractor	*	07/17/00	* 1 <sup>st</sup> rpt submitted using this format
Provide information to contractor	*	02/01	* 1 <sup>st</sup> rpt submitted using this format
Draft Phase I report from contractor	*	02/15/01	* 1 <sup>st</sup> rpt submitted using this format
Final Phase I report from contractor	*	04/30/01	* 1 <sup>st</sup> rpt submitted using this format
Review Phase I Report Findings	*	06/29/01	* 1 <sup>st</sup> rpt submitted using this format
<b><i>Phase II – Implementation of Project</i></b>			
Determine scope of Phase II	07/31/01	10/04/01	Difficult to meet over summer
Accept grant monies, create position	02/28/02	02/20/02	Need multiple approvals (Date previously shown for completion (02/28/01) was a

			typographical error.)
Revise inspection checklists	04/30/02		Haz. Waste Compliance Section (RCRA-C) program staff are working on this under the direction of one of the project team members.
Create compliance survey	04/30/02	04/26/02	
Field-test compliance survey	04/30/02	04/30/02	
Stakeholder involvement	04/30/02		DES Senior Leadership Team has not yet approved the proposal for a stakeholder committee.
Implement compliance survey	08/30/02	08/08/02	
Create <b>Compliance Measures System ("CMS")</b>	<b>08/30/03</b>		<b>As worked progressed, we determined that our original plan (to add a module to our Manifest Tracking System) would not work due to deficiencies in the MTS. The MTS is being revamped and recreated as the Hazardous Waste Information Management System (HzWIMS) in conjunction with the work on the Compliance Measures System.</b>
Determine baseline compliance rates	03/31/03		<b>Still on track; database work allows analysis of data collected prior to full roll-out of new CMS.</b>

[**Bold face** indicates item added since last report.]

### III. Status of Project Completion.

Anticipated project completion date: 03/31/03

### IV. Results:

In this reporting period (October 1, 2002 to December 31, 2002), the project team has met to discuss which analyses to apply to the survey data collected by the summer interns. Also, work has continued on database development and on follow-up activities, including the following:

- Relative to the need to provide additional training to SQGs (esp. SQGs w/ extended storage), we determined that a more comprehensive approach that was modeled on the Massachusetts ERP would facilitate greater improvements over a longer period of time and also would provide data needed for measuring compliance. We thus focused on developing the concept for a Small Quantity Generator Self-Certification Program and on drafting legislation to provide statutory authority for the program.
- The sites needing full compliance inspections have been added to the inspection list and inspections are proceeding.
- RCRA-C program staff worked with the NH Auto Dealers' Association to develop an approach that will result in accurate information being provided to NHADA members.

Also, due to the election of a new governor and impending changes in the DES Senior Leadership Team, we did not pursue the proposal for a stakeholder committee.

The Hazardous Waste Compliance Section staff completed the revisions to the full inspection checklist.